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American Long Lines

December 7, 1998

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Federal Communications Commission  
Common Carrier Bureau  
Network Services Division  
Washington, D.C. 20554

95-155  
Received

DEC 10 1998

Re: Non-Compliance with set aside 888 numbers

To Whom It May Concern:

American Long Lines' non-compliance with the plans for the release of 888 vanity numbers was entirely unintentional. The instructions set forth and modified in letters from the SMS/800 Management Team dated April 9, 1998, May 15, 1998, and June 1, 1998 respectively were misinterpreted. On behalf of American Long Lines, I want to ensure you that we are not in any way attempting to "warehouse" set aside 888 numbers or the corresponding 800 numbers. Further, American Long Lines' 888 replication requests sent were legitimately requested by customers back in 1996.

Our non-compliance is a result of our misinterpreting the desired due date of when we needed to send DSMI a final batch listing subscribers which failed to respond to our notification. The only date mentioned in the latest correspondence from SMS/800 merely stated "Please note that these numbers will be subject to an FCC audit after September 10, 1998." We assumed since, as described in the letter dated June 1, 1998 #11, "Under the terms of the FCC Order, those set-aside 888 numbers for which subscribers did not respond...will be retained in "unavailable" status," we were to continue to submit batch files to DSMI indicating "Spare" or "Reserve" as customers decided whether or not to retain the 888 number(s).

We have received responses from subscribers as recently as November 8<sup>th</sup> who wished to retain the 888 numbers. Had we returned those numbers to a "Spare" status since they initially failed to respond to the notification, those subscribers would have possibly lost their numbers.

We sent all customers who requested in 1996 that their 800 vanity number be replicated with the new 888 toll-free prefix an informational mailing (please see attached) about their first right of refusal of their set aside 888 number(s). Subsequent efforts were made by American Long Lines to customers who did not respond to the mailing via fax and/or phone to ensure the notification was received/understood and if a decision was made to either retain or release the set aside 888 number(s).

All our notification attempts have been documented and will be forwarded via overnight mail to DSMI along with all required subscriber information in the requested file format. We should have the file completed no later than December 10, 1998.

If you should have any questions, please contact me at 215-442-9700, Ext. 501

Sincerely,



Kyle S. Engart  
American Long Lines (RespOrg ID ASL01)  
Toll Free Services

No. of Copies rec'd 041  
List ABCDE

cc: DSMI

June 17, 1998

Contact Name  
Bill Loc Name  
Addr1  
Addr 2  
City, ST, Zip

Re: Release of your "Protected" Number 888-###-####

Dear Contact Name,

The Federal Communications Commission (FCC) reached a decision as to the outcome of the pool of replicated 888 vanity numbers. On March 31, 1998, the FCC released its Fourth Report and Order and Memorandum Opinion and Order in Docket No. 95-155 which concluded that "...vanity numbers in the 888 code shall be assigned pursuant to a right of first refusal." Therefore, customers who had requested their 800 vanity numbers be replicated now have first right to retain those numbers.

Our records indicate that you had requested the replication of your existing 800 vanity number with the corresponding 888 vanity number, 888-###-####.

***IF YOU WISH TO OBTAIN THE 888 NUMBER:***

1. **Complete the "RELEASE REQUEST" enclosed which must be copied onto your company letterhead.**
2. **Fax or mail the release to the number/address provided for receipt by Monday, July 13, 1998.**  
*American Long Lines must be notified by you in writing no later than Monday, July 13, 1998 of your intent to activate the 888 number or the 888 number will be released to the general pool of numbers and made available on a first-come, first-served basis.*
3. **The 888 number will be assigned to you no later than Wednesday, September 30, 1998.**  
American Long Lines will confirm the time/date the number has been assigned to you and service has been established to the requested ring-to number. To note, we can not guarantee a toll-free number until the number is in working status to the requested ring-to number. Therefore, *any advertising and/or promotional materials should not contain the 888 vanity number until the number is working.*

***IF YOU ARE NOT INTERESTED IN OBTAINING THE 888 NUMBER:***

1. **Complete the form entitled "REFUSAL" which must be copied onto your company letterhead.**
2. **Then fax or mail the release to the number/address provided by Monday, July 13, 1998.**  
The 888 number shall be released into the spare pool of available numbers for assignment on a first-come, first-served basis.

If you should have any questions, please contact Customer Services at 1-800-922-7730.

Thank-you for your continued business.

Sincerely,  
American Long Lines, Customer Services

## ***FREQUENTLY ASKED QUESTIONS ABOUT TOLL-FREE SERVICES:***

### **1. What is a “vanity number”?**

**ANSWER:** A “vanity number” is a toll-free number whose digits spell a name or word of value in which a subscriber has a commercial or financial interest. In October 1995, the Federal Communications Commission (FCC) initiated a rulemaking proceeding to smooth the transition to an expanded set of toll free service access codes, starting with the introduction of 888 numbers. The Commission noted that some 800 subscribers have interest in reserving the equivalent 888 vanity number. The FCC allowed subscribers of 800 vanity numbers, through their carrier, to request that their 800 vanity numbers be “replicated” and placed in an “unavailable” pool pending further action by the Commission.

### **2. How many 888 numbers were placed in an “unavailable” status?**

**ANSWER:** Approximately 380,000 toll-free 888 numbers were placed in the “unavailable” status.

### **3. Does the 888 vanity number replace my existing number?**

**ANSWER:** No. The new 888 number does not replace your existing 800 number.

### **4. If a company has an 800 number, can I also reach them by calling the 888 equivalent?**

**ANSWER:** No. 800 and 888 numbers are separate and distinct numbers. 888 numbers were introduced to increase the pool of toll-free numbers.

### **5. Will we also run out of 888 numbers in the future?**

**ANSWER:** Just as the 800 number pool draws near depletion due to the rapid growth in demand for toll-free services, the same is likely to happen to 888 numbers. On April 5, 1998, the toll-free service access code 877 was introduced.

### **6. Can I replicate my current toll-free number with the 877 toll-free code?**

**ANSWER:** No. Although the FCC allowed customers the choice of replicating their 800 vanity number(s) with the introduction of 888 numbers, the FCC concluded, in its Fourth Report and Order, vanity numbers in the newly introduced 877 toll free code (and toll-free service access codes beyond 877) shall be released and made available on a first-come, first-served basis.

### **7. Are there any operational changes I need to make to prepare my business for toll-free 877 service?**

**ANSWER:** You may need to contact your PBX vendor to ensure that 877 calls can originate from your system. As new service access codes are introduced, your equipment vendor may need to be contacted. The next service access code to be introduced is 866. No release date for the 866 toll-free code has been given.

### **8. Can I still get toll-free Directory Assistance through “1-800-555-1212”?**

**ANSWER:** Yes. Regardless of the service access code, toll-free Directory Assistance for 800, 888, and 877 numbers can be obtained by calling “1-800-555-1212.”

{RELEASE REQUEST}

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

To: ***American Long Lines***  
Toll-Free Services  
P.O. Box 449  
Horsham, PA 19044-0449  
Fax: 1-800-784-3299

I hereby attest that I am the actual subscriber of record for **800-###-####** and that American Long Lines is the Responsible Organization (RespOrg) of this number. I would like the ability to activate the corresponding 888 number, **888-###-####** to the requested ring-to number listed below. Therefore, I request that pursuant to the FCC Fourth Report and Order and Memorandum Opinion and Order (FCC 98-48) in Docket No. 95-155, dated March 31, 1998, the corresponding 888 number be placed under control of the RespOrg, American Long Lines, RespOrg ID ASL01.

Ring-To Number: (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Printed Name of Signatory

{COPY ON LETTERHEAD}

{REFUSAL}

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_  
Date

To: ***American Long Lines***  
Toll-Free Services  
P.O. Box 449  
Horsham, PA 19044-0449  
Fax: 1-800-784-3299

I hereby attest that I am the actual subscriber of record for **800-###-####** and that American Long Lines is the Responsible Organization (RespOrg) of this number. I am **not interested** in activating the corresponding 888 number, **888-###-####**. Although pursuant to the FCC Fourth Report and Order and Memorandum Opinion and Order (FCC 98-48) in Docket No. 95-155, dated March 31, 1998, I have first right to retain the corresponding 888 number, I choose not to do so.

I understand by authorizing this refusal, the 888 number, **888-###-####** shall be released into the spare pool of available numbers for assignment on a first-come, first served basis.

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Printed Name of Signatory

{ COPY ON LETTERHEAD }